

ADEQ

ARKANSAS
Department of Environmental Quality

CERTIFIED MAIL 91 7199 9991 7030 4900 8388

May 31, 2012

Harcros Chemicals Inc.
Attn: John Miles
General Manager
4280 Riffle Range Road
Vicksburg, MS 39180

Re: Quapaw Products LLC
Former Cedar Chemical Company, Helena – West Helena, Arkansas

Dear Mr. Miles:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) performed a site inspection of the former Cedar Chemical site in Helena-West Helena, Arkansas on April 27, 2012. The following items were observed or discussed during the site visit:

1. ADEQ personnel observed cracked asphalt where a pole had been pulled out and holes where the poles of the shed had been cut off. These areas should be patched and filled to prevent seepage of water and potential exposure to the chemicals of concern beneath the asphalt.
2. An employee of Harcros indicated your intent to demolish the “old” lab building due to flooding and mold issues. This building was not included in the demolition remedy in the Remedial Action Decision Document for the former Cedar Chemical site. ADEQ concurs with this decision. Please submit a demolition plan 30 days prior to demolition work.
3. A Harcros employee discussed cost estimates and the need for underground utilities in order for Harcros to utilize Unit 5. ADEQ reminds Harcros, that site usage according to the lease agreement is currently restricted to “a wood products process and manufacturing facility.” Paragraph 7 of the Lease Agreement with Option to Purchase states: “Lessor requires Lessee to obtain express written approval of ADEQ for any contemplated alterations to the Premises or for any desired change in site usage.” If Harcros desires to change the site usage or make alterations to the Premises then you must notify ADEQ and obtain our written approval. It will take time to examine and approve any such requests so Harcros should provide ADEQ with detailed plans to make alterations well in advance of any contemplated construction activities.



4. ADEQ was informed that Harcros is working with Clean Harbors LLC to dispose of the waste from renovation of a sump. ADEQ would like updates on the characterization and disposal every two weeks.
5. Investigation Derived Waste (IDW) has been discovered at the site by a Harcros employee. Please make arrangements to have the IDW disposed within 45 days of receipt of this letter.

If you have any questions, please contact me at 501-682-0841 or cusher@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink that reads "Annette Cusher". The signature is fluid and cursive, with the first name "Annette" and last name "Cusher" clearly distinguishable.

Annette Cusher, P.E.
Engineer Supervisor
Technical Branch
Hazardous Waste Division

cc: John Peiserich, Attorney, Perkins and Trotter PLLC, P.O. Box 251618, Little Rock, AR
72225-1618
Dara Hall, Attorney, ADEQ

ADEQ

Hazardous Waste Division



Technical Branch

Trip Report

Project	Cedar Chemical Site
Location	Helena-West Helena
Date	4/27/2012
Time	1100 to 1136 hours
Reason	Monthly Site Visit
ADEQ personnel	Annette Cusher Jim Rigg
Facility, contractor and EPA personnel	Mr. Harrington
Activity Summary	<p>Jim and I were met upon arrival at the site by Mr. Harrington. The following issues were discussed during the walk through.</p> <ul style="list-style-type: none"> • A pole was removed cracking the asphalt while demolishing a shed. The remaining poles were cut off at the level of the asphalt. • The old lab building is collecting water after rain events and has become moldy. Harcross would like to demolish the building. • The waste from the renovation of the sump is still covered on a slab. Mr. Harrington indicated Harcross was in contact with Clean Harbors for disposal. • Mr. Harrington also indicated that Harcross would be running underground utilities when they begin to utilize the unused unit. • There are several five gallon buckets of what appears to be purge water (buckets are labeled with monitoring well numbers) still on-site. Harcross would like to know what should be done with the containers. • There is a desk and files being moved into the warehouse. • Harcross is planning on placing fresh gravel in the boneyard and placing the "loose" equipment into the boneyard to improve the look of the site. • There are some empty, damaged containers in a area of the site. Harcross indicated that Enviro Tech has been told to properly dispose if the waste containers.

Action Items Summary	Give Mr. Harrington an update on the purge water.
Anticipated follow-up	<p>Potential items to be discussed regarding the lease:</p> <ul style="list-style-type: none"> • Repair asphalt, fill holes inside poles. • Underground utilities • Which process is Quapaw planning to run at the site? • Demolition of the lab • Continued updates on the disposal of the waste pile.
Other	

Route to:

ADEQ personnel review	Date
Jim Rigg 	5/2/12
Tammie Hynum 	5/14/12

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:	Cedar Chemical Site						
Photographer:	A. Cusher				Witness:	J. Rigg	
Photo #	1	Of	6		Date:	4/27/2012	Time:
Description:	Cracked asphalt from pole removal						



Photographer:	A. Cusher				Witness:	J. Rigg	
Photo #	2	Of	6		Date:	4/27/2012	Time:
Description:	Area where poles were cut off at asphalt level						



**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:		Cedar Chemical Site						
Photographer:		A. Cusher			Witness:		J. Rigg	
Photo #	3	Of	6		Date:	4/27/2012	Time:	
Description:		Covered waste pile						



Photographer:		A. Cusher			Witness:		J. Rigg	
Photo #	4	Of	6		Date:	4/27/2012	Time:	
Description:		5 gallon containers of purge water						



**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:		Cedar Chemical Site						
Photographer:		A. Cusher			Witness:		J. Rigg	
Photo #	5	Of	6		Date:	4/27/2012	Time:	
Description:		Close up of 5 gallon container label						



Photographer:		A. Cusher			Witness:		J. Rigg	
Photo #	6	Of	6		Date:	4/27/2012	Time:	
Description:		Damaged empty containers						





ARKANSAS
Department of Environmental Quality

HAZARDOUS WASTE DIVISION ROUTING SLIP

May 23, 2012

Subject: Former Cedar Chemical Site

From: A. Cusher *AC*

<u>Route in turn to:</u>	<u>Action Needed</u>	<u>Initials</u>	<u>Date</u>
Tammie Hynum	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<i>TH</i>	<i>5/23/12</i>
Dara Hall	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review <i>changed</i>	<i>DH</i>	<i>5/25/12</i>
Clyde Rhodes, Jr. <i>Ryan Benefield</i>	<input checked="" type="checkbox"/> Concurrence <input checked="" type="checkbox"/> Review	<i>CR</i>	<i>5/30/12</i>

***Note:** Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.

DISPOSITION:

Return to Annette Cusher

COMMENTS: *[Insert a brief description of the contents being routed]*

Several items need addressed from a site visit to Cedar.